REMARKS

Claims 48-76 are currently pending in the application. Applicant respectfully requests reconsideration of the pending claims in view of the following remarks.

Claim Rejections – 35 U.S.C. § 102

The Examiner rejected Claims 48-49, 54-58, and 65 under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 67,076,458 ("Lawlor").

Lawlor does not disclose the subject matter of amended independent Claim 48. More specifically, Lawlor does not disclose a debit data validation system for a network, the system comprising at least the following elements:

(a) a calling application configured to receive a request to validate debit data from a merchant, and receive transactional debit data that is to be validated;

(b) a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data to identify a consumer key;

(c) a debit data warehouse including stored debit data, wherein the debit data warehouse is configured to retrieve the stored debit data associated with the consumer key wherein the stored debit data is representative of at least one consumer, and further wherein the consumer key links the stored debit data gathered from a plurality of data sources.

First, Lawlor does not disclose "a calling application configured to receive a request to validate debit data from a merchant, and receive transactional debit data that is to be validated." Rather, Lawlor discloses a financial services distribution system 50 including a central computer 52, a plurality of remote terminals 54, a digital packet network switch 56, a packet assembler/disassembler 58, communications interface 60, and a dialup telephone network 62. Col. 17, lines 21-31. The central computer 52 interfaces with banking institutions 64 through the conventional ATM interchange switch 66. Col. 17, lines 63-66. A user accesses a remote terminal 54 to perform banking functions such as bill paying, account transfer, account information or other services. Col. 31, lines 57-60.

The Examiner indicates that "a calling application configured to receive a request to validate debit data from a merchant, and receive transactional debit data that is to be validated" is disclosed at col. 7, lines 47-60; col. 21, line 44 – col. 22, line 2; Figure 1/elements 54-62; and col. 17, lines 21-31. However, none of these sections disclose "a calling application configured to receive a request to validate debit data from a merchant." The "calling application" is considered by the Examiner to comprise elements 54 (remote terminal), 56 (digital packet

network switch), 58 (packet assembler/disassembler), 60 (communications interface), and 62 (dialup telephone network). These particular elements receive a request from a consumer using the remote terminal to perform a banking function such as bill paying, account transfer, account information or other services. The user of the remote terminal 54 is not a merchant, nor do these particular elements receive a "request to validate debit data" or "receive transactional debit data."

Second, Lawlor does not disclose "a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data to identify a consumer key." The Examiner indicates that the debit data search engine comprises element 80 illustrated in Figure 1A. Element 80 is the CPU of the central computer 52 and includes various modules specified therein. One module is the authorization module 80D, which determines the customer identity (through the PIN and other values transmitted by the terminal). User account number and PIN values are transmitted to the user's bank for verification. The Examiner further indicates that this claimed element of Claim 48 is disclosed in col. 19, line 44 – col. 20, line 43.

Lawlor does not disclose that the CPU 80 "process[es] the transactional debit data to identify a consumer key." As noted above, the authorization module 80D determines the customer identity – it does not "identify a consumer key" from the received transactional debit data.

Third, Lawlor does not disclose "a debit data warehouse including stored debit data, wherein the debit data warehouse is configured to retrieve the stored debit data associated with the consumer key wherein the stored debit data is representative of at least one consumer, and further wherein the consumer key links the stored debit data gathered from a plurality of data sources." The Examiner indicates that this subject matter is disclosed in Figure 1A/element 84; col. 18, line 60 – col. 19, line 23.

The CPU 80 communicates with database 84 to facilitate communications and billpaying transactions. Col. 19, lines 5-8. There is no indication that database 84 "retrieve[s] stored debit data associated with the consumer key." In addition, there is no indication that "the consumer key links the stored debit data [that is] gathered from a plurality of data sources."

For at least these reasons, Lawlor does not disclose the subject matter of Claim 48. Accordingly, independent Claim 48 is allowable. Claims 49-75 depend from Claim 48 and are allowable for at least the reasons Claim 48 is allowable. Claims 49-75 may include additional patentable subject matter not discussed herein.

Claim Rejections – 35 U.S.C. § 103

The Examiner rejected Claims 50-53, 59-64, and 66-76 under 35 U.S.C. § 103 as being unpatentable over Lawlor in view of U.S. Patent No. 6,026,398 ("Brown").

Claims 50-53, 59-64, and 66-75 depend from Claim 48 and are allowable for at least the reasons discussed above with respect to Claim 48. As noted above, Lawlor does not disclose the subject matter of Claim 48. Brown does not cure the deficiencies of Lawlor. Brown does not disclose a debit data validation system for a network, the system comprising at least the following elements:

(a)   a calling application configured to receive a request to validate debit data from a merchant, and receive transactional debit data that is to be validated;

(b)   a debit data search engine including a keying module and a matching module, wherein the debit data search engine is configured to receive the transactional debit data from the calling application, and process the transactional debit data to identify a consumer key;

(c)   a debit data warehouse including stored debit data, wherein the debit data warehouse is configured to retrieve the stored debit data associated with the consumer key wherein the stored debit data is representative of at least one consumer, and further wherein the consumer key links the stored debit data gathered from a plurality of data sources.

Rather, Brown discloses "database records which either closely or exactly match the input search data." Abstract. In particular, Brown discloses that the "input search data is broken down into elements, and elements are converted to terms having a finite set of possible values. … The terms are compared against an index of terms to determine which database records relate to the input search data. Through statistical analysis, match records are given a record weight which may be used to calculate how closely the input data actually is to each match record." Abstract. Clearly, Brown merely discloses receiving input data, processing the input data, and determining matching database records based on the input data. Brown does not disclose validating any type of data. Furthermore, Brown makes no mention whatsoever of processing debit data or transactional debit data.

Accordingly, Claims 50-53, 59-64, and 66-75 are allowable.

Lawlor does not disclose the subject matter of independent Claim 76. More specifically, Lawlor does not disclose a method of conducting a debit data validation of a consumer involved in a debit transaction, the method comprising at least the following elements:

(a)   receiving a request from a merchant to validate debit data of the consumer involved in a debit transaction;

(b)   receiving transactional debit data that is to be validated;

(c)   retrieving a consumer key based on at least a portion of the transactional debit data, the consumer key linking debit data from a plurality of data sources;

(d)   analyzing the debit data associated with the consumer key; and

(e)   generating a response message to the merchant, wherein the response message is indicative of one of a first condition and a second condition, wherein the first condition is a validation of the debit data, and further wherein the second condition is a lack of validation of the debit data of the consumer.

As noted above, the financial services distribution system 50 of Lawlor receives a request from a consumer using the remote terminal 54 to perform a banking function such as bill paying, account transfer, account information or other services. The user of the remote terminal 54 is not a merchant, nor do these particular elements receive a "request ... to validate debit data" or "receive transactional debit data tat is to be validated."

As also noted above, Lawlor does not disclose that the CPU 80 "retriev[es] a consumer key based on at least a portion of the transactional debit data." As noted above, the authorization module 80D determines the customer identity – it does not "retrieve a consumer key" from the transactional debit data.

Brown does not cure the deficiencies of Lawlor. Brown does not disclose a method of conducting a debit data validation of a consumer involved in a debit transaction, the method comprising at least the following elements:

(a)   receiving a request from a merchant to validate debit data of the consumer involved in a debit transaction;

(b)   receiving transactional debit data that is to be validated;

(c)   retrieving a consumer key based on at least a portion of the transactional debit data, the consumer key linking debit data from a plurality of data sources;

(d)   analyzing the debit data associated with the consumer key; and

(e)   generating a response message to the merchant, wherein the response message is indicative of one of a first condition and a second condition, wherein the first condition is a validation of the debit data, and further wherein the second condition is a lack of validation of the debit data of the consumer.

As discussed above, Brown merely discloses receiving input data, processing the input data, and determining matching database records based on the input data. Brown does not

disclose validating any type of data. Furthermore, Brown makes no mention whatsoever of processing debit data or transactional debit data.

For at least these reasons, Lawlor and Brown do not disclose the subject matter of Claim 76. Accordingly, independent Claim 76 is allowable.

CONCLUSION

In view of the foregoing, allowance of the pending claims is respectfully requested. The undersigned is available for telephone consultation during normal business hours.

Respectfully submitted,

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